

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

YELLOW CORPORATION, *et al.*,

Debtors.

Chapter 11

Case Nos. 23-11069 (CTG), *et seq.*
(jointly administered)

Hearing date: November 13, 2023, 10:00 a.m.

Objection deadline: October 28, 2023

NOTICE OF MOTION

TO: Parties listed on the Certificate of Service

Sopia L. Goodman (“Movant”) has filed a Motion for Relief From The Automatic Stay (the “Motion”), which seeks the following relief: Relief from the automatic stay to prosecute litigation under applicable non-bankruptcy law against one or more of the above-captioned debtors for discrimination, retaliation, and other employment-related claims, including but not limited to pursuing available insurance proceeds.

HEARING ON THE MOTION WILL BE HELD ON NOVEMBER 13, 2023 AT 10:00 A.M. PREVAILING EASTERN TIME.

You are required to file a response, if any, on or before October 28, 2023 at 4:00 P.M. Prevailing Eastern Time. At the same time, you must also serve a copy of the response upon Movant’s attorneys:

Adam Hiller, Esquire
Hiller Law, LLC
300 Delaware Avenue
Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

Seth A. Pajcic, Esquire
PAJCIC & PAJCIC, P.A.
One Independent Drive, Suite 1900
Jacksonville, Florida 32202
Telephone: (904) 358-8881
Telefax: (904) 354-1180
seth@pajcic.com
monica@pajcic.com

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE RELIEF REQUESTED IN THE MOTION MAY BE GRANTED BY THE COURT WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 19, 2023
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

-and-

Seth A. Pajcic, Esquire
PAJCIC & PAJCIC, P.A.
One Independent Drive, Suite 1900
Jacksonville, Florida 32202
Telephone: (904) 358-8881
Telefax: (904) 354-1180
seth@pajcic.com
monica@pajcic.com

Attorneys for Movant, Sophia L. Goodman